

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

**LINDA FLOYD, individually and on
behalf of others similarly situated,**

Plaintiff,

**Civil Action No. _____
JURY DEMANDED**

v.

ALLSTATE INDEMNITY COMPANY

Defendants.

**PLAINTIFF LINDA FLOYD'S RESPONSES TO LOCAL
RULE 26.01 INTERROGATORIES**

COMES NOW Plaintiff Linda Floyd, and for her answers to the Local Rule 26.01 Interrogatories, states as follows:

INTERROGATORY (A):

State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE TO INTERROGATORY (A):

None.

INTERROGATORY (B):

As to each claim, state whether it should be tried jury or non-jury and why.

RESPONSE TO INTERROGATORY (B):

At this point, Count I should be tried by a jury because it may implicate questions of fact. Count II seeks declaratory relief, thus it should be resolved as a matter of law by the Court.

INTERROGATORY (C):

State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE TO INTERROGATORY (C):

Plaintiff's is not a publicly owned company.

INTERROGATORY (D):

State the basis for asserting the claim in the division in which it was filed (or the basis of any challenges to the appropriateness of the division).

RESPONSE TO INTERROGATORY (D):

Plaintiff is a resident of Lake City, SC. The subject insurance contract was executed in Lake City, SC to insure Plaintiff's residence, which is located in Lake City, SC. The breach of the contract occurred in Lake City, SC.

INTERROGATORY (E):

Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases; arise from the

same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by difference judges.

RESPONSE TO INTERROGATORY (E):

This action is unrelated in whole or part to any other matter filed in this District.

INTERROGATORY (F):

If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleadings reflecting the correct identification.

RESPONSE TO INTERROGATORY (F):

Not Applicable.

INTERROGATORY (G):

If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE TO INTERROGATORY (G):

Not applicable.

Dated this 20th day of January 2020.

Respectfully submitted,

/s/ Summer C. Tompkins
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